

Exhibit A



Kathleen Zellner <kathleen.zellner@gmail.com>

Spencer - Video testimony of Dr. Ann Link / California

Kathleen Zellner <kathleen.zellner@gmail.com>

Tue, Oct 8, 2013 at 9:05 AM

To: Guy Bogdanovich <gbogdanovich@lldkb.com>, Jeff Freimund <JeffF@fjtlaw.com>

Dear Counsel:

We have been informed by Dr. Link that she will not be available to testify of the trial. We would like to take her video evidence dep on Monday, December 9th in California. Please confirm this date as soon as you can so we can make the arrangements.

Sincerely,

Scott Panek
Office Manager

--

Kathleen T. Zellner & Associates
Esplanade IV
1901 Butterfield Road
Suite 650
Downers Grove, Illinois 60515
(630) 955-1212

Exhibit B



Kathleen Zellner <kathleen.zellner@gmail.com>

Spencer - Video testimony of Dr. Ann Link / California

Guy Bogdanovich <gbogdanovich@lldkb.com>

Wed, Oct 9, 2013 at 5:36 PM

To: Kathleen Zellner <kathleen.zellner@gmail.com>, Jeff Freimund <JeffF@fjtlaw.com>

Hello Scott and Ms. Zellner: Although it is less than ideal given the pre-trial deadlines in this case and other matters I am committed to, I can currently make myself available for Dr. Link's videotaped deposition on Monday, December 9th. For planning purposes, are counsel for plaintiff going to be present in California with Dr. Link?

Also, I am still in the process of evaluating the relevancy and admissibility of all of the evidence disclosed in discovery in light of the Court's recent orders. By agreeing to the scheduling of this deposition, I am not stipulating to the relevance or admissibility of Dr. Link's testimony, or waiving my right to object to any or all of her testimony, depending upon content. I am also agreeing to schedule this deposition based upon the assumption that defense counsel will be extended similar accommodation by plaintiff's counsel should the need arise.

Thanks for your consideration of these issues. Guy

From: Kathleen Zellner [mailto:kathleen.zellner@gmail.com]

Sent: Wednesday, October 09, 2013 2:00 PM

To: Guy Bogdanovich; Jeff Freimund

Subject: Fwd: Spencer - Video testimony of Dr. Ann Link / California

[Quoted text hidden]

Exhibit C



Kathleen Zellner <kathleen.zellner@gmail.com>

Spencer - Video testimony of Dr. Ann Link / California

Jeff Freimund <JeffF@fjtlaw.com>

Wed, Oct 9, 2013 at 5:51 PM

To: Guy Bogdanovich <gbogdanovich@lldkb.com>, Kathleen Zellner <kathleen.zellner@gmail.com>

I join in Guy's comments and reservations. I, too, am currently available on December 9. Please let me know if you intend to conduct this deposition by videoconferencing, or in person. Thanks.

Jeff Freimund

Freimund Jackson Tardif & Benedict Garratt, PLLC

(360) 534-9960

From: Guy Bogdanovich [mailto:gbogdanovich@lldkb.com]

Sent: Wednesday, October 09, 2013 3:36 PM

To: Kathleen Zellner; Jeff Freimund

Subject: RE: Spencer - Video testimony of Dr. Ann Link / California

[Quoted text hidden]

Exhibit D



Kathleen Zellner <kathleen.zellner@gmail.com>

Spencer - Video testimony of Menona Landrum / California

Kathleen Zellner <kathleen.zellner@gmail.com>

Thu, Oct 24, 2013 at 1:54 PM

To: Jeff Freimund <JeffF@fjtlaw.com>, Guy Bogdanovich <gbogdanovich@lldkb.com>

Dear Counsel:

We have been informed that Menona Landrum will not be available to testify at trial. We would like to take her video evidence dep on Tuesday, December 10th in Napa, California. Please confirm this date as soon as you can so we can make the arrangements.

Sincerely,

Scott Panek
Office Manager

Kathleen T. Zellner & Associates
Esplanade IV
1901 Butterfield Road
Suite 650
Downers Grove, Illinois 60515
(630) 955-1212

Exhibit E



Kathleen Zellner <kathleen.zellner@gmail.com>

Spencer - Video testimony of Menona Landrum / California

Guy Bogdanovich <gbogdanovich@lldkb.com>

Tue, Oct 29, 2013 at 12:27 PM

To: Kathleen Zellner <kathleen.zellner@gmail.com>, Jeff Freimund <JeffF@fjtlaw.com>

Hello Ms. Zellner: Jeff and I had not yet responded in part because we too have been trying to resolve a potential trial testimony issue involving Matthew Hansen. At this point we've identified a time frame, December 4-6 or December 12, during which we will need to schedule a videotape evidence deposition of Matthew Hansen in Vancouver, Washington. Please let us know which of these dates will work for you so that we can make the necessary arrangements. Assuming this will work, we will be able to attend the second of your evidence depositions, of Ms. Landrum, as indicated below on Tuesday, December 10 in Napa.

Thanks for your continuing attention to this matter.

Guy

From: Kathleen Zellner [mailto:kathleen.zellner@gmail.com]

Sent: Tuesday, October 29, 2013 9:17 AM

To: Jeff Freimund; Guy Bogdanovich

Subject: Re: Spencer - Video testimony of Menona Landrum / California

[Quoted text hidden]

Exhibit F

DD7020SX SCC
10/25/2013 2:59 PM

CLARK COUNTY DISTRICT COURT
D O C K E T

PAGE: 1

DEFENDANT

HANSEN, MATTHEW ALAN

BATTLE GROUND WA 98604

CASE: 205066D CKP
Criminal Non-Traffic
Agency No.

Home Phone: [REDACTED]

AKA HANSEN, MATTHEW MAC
AKA HANSEN, MATTHEW ALLAN MAC

*** WARRANT ISSUED ***

OFFICER

03617 CLS GOSCH, T
03221 CLS MARLER, C J

CHARGES

Violation Date: 10/13/2011

		DV Plea	Finding
1	9A.52.070	CRIMINAL TRESPASS-1ST DEG Y	Guilty DV Pled an
2	26.50.110	PROTECTION ORDER VIOLATIO Y	Guilty DV Pled an
3	26.50.110	PROTECTION ORDER VIOLATIO Y	Guilty DV Pled an
4	26.50.110	PROTECTION ORDER VIOLATIO Y	Guilty DV Pled an
5	26.50.110	PROTECTION ORDER VIOLATIO Y	Guilty DV Pled an

TEXT

S 10/19/2011 Case Filed on 10/19/2011

LKP

Charge 1 is DV-related

Charge 2 is DV-related

Charge 3 is DV-related

DEF 1 HANSEN, MATTHEW ALAN Added as Participant

U 5 CHARGES FILED, ADD ON PER DVPA FOR PRIS ARR, EXON/EMAILED
S11-14022

S Charge 4 is DV-related

Charge 5 is DV-related

OFF 1 GOSCH, T Added as Participant

OFF 2 MARLER, C J Added as Participant

ARR DVPRI Set for 10/19/2011 01:00 PM

AZK

in Room 6 with Judge JPH

ARR DVPRI: Held

SLB

Proceedings Recorded on Tape No. G-2 JPH

Order created on 10/19/2011 NO CONTACT entered by

HAGENSEN, JOHN P expires on 10/19/2016

Defendant Arraigned on Charge 1

Plea/Response of Not Guilty Entered on Charge 1

Defendant Arraigned on Charge 2

Plea/Response of Not Guilty Entered on Charge 2

Defendant Arraigned on Charge 3

Plea/Response of Not Guilty Entered on Charge 3

Defendant Arraigned on Charge 4

Plea/Response of Not Guilty Entered on Charge 4

Defendant Arraigned on Charge 5

Plea/Response of Not Guilty Entered on Charge 5

U PER JPH DEF HELD \$10,000 BAIL/NOA FILED BY DEF ATY VAN DEF

SAC REFERRAL FILED COPY TO TSC COORDINATOR

S REV DV Set for 11/01/2011 01:00 PM

in Room 6 with Judge JPH

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CLARK COUNTY DISTRICT COURT
D O C K E T

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DEFENDANT
HANSEN, MATTHEW ALAN

CASE: 205066D CKP
Criminal Non-Traffic
Agency No.

TEXT - Continued

U	10/19/2011	SCANNED: CONFIDENTIAL-LEA REPORT SCANNED: COURT DOCKET SHEET SCANNED: CITATION/COMPLAINT SCANNED: CITATION/COMPLAINT-UPDATED	CAD
S	11/01/2011	REV DV: Held Proceedings Recorded on Tape No. G-2 JPH	SLB
U		DEF ATY VAN DEF/DEFENDANT/DPA LOUGHLIN PRESENT	
S		PER JPH SET OVER REV FOR ENTRY SAC COURT /DEF HELD SAME BAIL	
		REV DV Set for 11/09/2011 01:00 PM in Room 6 with Judge JPH	
U		WAIVER FILED NEW 90 DAY COMMENCEMENT DATE 11-9-11	
S	11/09/2011	REV DV: Held Proceedings Recorded on Tape No. G-2 JPH Plea/Response of Guilty Entered on Charge 1 Finding/Judgment of Awaiting Sentencing for Charge 1 Case Heard Before Judge HAGENSEN, JOHN P Plea/Response of Guilty Entered on Charge 2 Finding/Judgment of Awaiting Sentencing for Charge 2 Case Heard Before Judge HAGENSEN, JOHN P Plea/Response of Guilty Entered on Charge 3 Finding/Judgment of Awaiting Sentencing for Charge 3 Case Heard Before Judge HAGENSEN, JOHN P Plea/Response of Guilty Entered on Charge 4 Finding/Judgment of Awaiting Sentencing for Charge 4 Case Heard Before Judge HAGENSEN, JOHN P Plea/Response of Guilty Entered on Charge 5 Finding/Judgment of Awaiting Sentencing for Charge 5 Case Heard Before Judge HAGENSEN, JOHN P	
U		PER JPH MOTION TO RESCIND NCO GRANTED / DEF HELD W/O BAIL	
S		Finding/Judgment of Guilty for Charge 1 Finding/Judgment of Guilty DV Pled and Proved for Charge 2 Pay Fine : 693.00 PAY Review Set for 05/31/2013 Pay Fine : 400.00 PAY Review Set for 05/31/2013 Pay or Serve : 30 D No Criminal Violations : 2 Y Finding/Judgment of Guilty DV Pled and Proved for Charge 3 Finding/Judgment of Guilty DV Pled and Proved for Charge 1 Finding/Judgment of Guilty DV Pled and Proved for Charge 4 Finding/Judgment of Guilty DV Pled and Proved for Charge 5	TJW
U		SCANNED: JS JUDGMENT/SENTENCE	CAD
S	11/10/2011	Order modified On 11/10/2011 NO CONTACT modified termination date from blank to 11/09/2011 Case Condition Terminated: No Contact Order REV SAC Set for 11/15/2011 02:30 PM in Room 1 with Judge VLS	SLB
	11/15/2011	REV SAC: Held Proceedings Recorded on Tape No. G3 VLS	TRR

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CLARK COUNTY DISTRICT COURT
D O C K E T

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DEFENDANT
HANSEN, MATTHEW ALAN

CASE: 205066D CKP
Criminal Non-Traffic
Agency No.

TEXT - Continued

U	11/15/2011	DEF RELEASED ROR/S/O FOR SAC REVIEW - KLP	TRR
S		REV SAC Set for 11/29/2011 02:00 PM in Room 1 with Judge VLS	
U	11/21/2011	VIC'S COPY OF RESCINDED NCO RETURNED/UNABLE TO FWD	LEV
S	11/29/2011	REV SAC Rescheduled to 12/06/2011 02:00 PM	TRR
		in Room 1 with Judge VLS	
	12/06/2011	REV SAC: Held Proceedings Recorded on Tape No. G3 VLS	
U		DEF PRES/S/O TO OPT IN - VLS	
S		REV SAC Set for 12/13/2011 10:30 AM in Room 1 with Judge VLS	
	12/13/2011	REV SAC: Held Proceedings Recorded on Tape No. G3 VLS	
U		DEF OPTED IN TO SAC COURT - VLS	
		NOA FILED BY ATY BROOKE VITASOVIC	
S		OPI : Opt In	
	12/14/2011	ATY 1 VITASOVIC, BROOKE ANN Added as Participant	
	01/03/2012	OTH WARR Set for 01/03/2012 02:00 PM in Room A with Judge KLP	
		OTH WARR: Held BENCH Warrant Ordered Print on or after 01/03/2012 Warrant expires on 01/03/2017	
	01/04/2012	BENCH Warrant Issued for	SYS
		Fail To Post Bail/Appr/Arrng PR Fail To Comply Fail To Appear For Hearing No Bail	
U	01/06/2012	VICT COPY OF NCO RESCINSION RETURNED BY USPS	PAP
S	01/11/2012	Warrant Served	LXB
	01/12/2012	Warrant Returned	
U		RETN OF SERVICE FORM RCVD FROM CCSO/FWD TO PRIS ARR	
S		ARR DVPRI Set for 01/12/2012 01:00 PM in Room 6 with Judge JPH	JDR
		ARR DVPRI: Held	LEV
		Proceedings Recorded on Tape No. G-2 JPH	
U		PER JPH DEF HELD W/OUT BAIL/REFER TO SAC COURT	
S		REV SAC Set for 01/17/2012 02:30 PM in Room 1 with Judge VLS	
		ATY 2 BAILES, JASON CASE Added as Participant	
U		SCANNED: CONFIDENTIAL-LEA REPORT	CAD
		SCANNED: FINANCIAL SCREENING	
S	01/17/2012	REV SAC: Held	TRR
		Proceedings Recorded on Tape No. G3 VLS	
U		DEF/ATY VITASOVIC PRES/NO CHANGE ON HOLD/S/O SAC REVIEW - VLS	
S		REV SAC Set for 01/24/2012 02:30 PM in Room 1 with Judge VLS	
	01/24/2012	REV SAC: Held Proceedings Recorded on Tape No. 2-2 VLS	

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CLARK COUNTY DISTRICT COURT
D O C K E T

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DEFENDANT
HANSEN, MATTHEW ALAN

CASE: 205066D CKP
Criminal Non-Traffic
Agency No.

TEXT - Continued

U	01/24/2012	DEF RELEASED ROR - S/O FOR REVIEW OF SAC OPT IN - VLS	TRR
S	01/25/2012	REV SAC Set for 02/07/2012 10:30 AM in Room 1 with Judge VLS	
	01/31/2012	REV SAC Rescheduled to 01/31/2012 10:30 AM in Room 1 with Judge VLS REV SAC: Held Proceedings Recorded on Tape No. G3 VLS REV SAC Set for 02/07/2012 10:30 AM in Room 1 with Judge VLS	
U	02/03/2012	NOTICE OF WITHDRAWAL OF ATTORNEY	AXH
S	02/07/2012	REV SAC: Not Held, Wt/FTA Ordered Proceedings Recorded on Tape No. G3 VLS OTH WARR Set for 02/07/2012 02:00 PM in Room 1 with Judge VLS OTH WARR: Held Proceedings Recorded on Tape No. G3 VLS BENCH Warrant Ordered Print on or after 02/07/2012 Warrant expires on 02/07/2017	TRR
	02/08/2012	BENCH Warrant Issued for Fail To Post Bail/Appr/Arrng PR Fail To Comply Fail To Appear For Hearing No Bail	SYS
U		SCANNED: PRE-LIBERTY	CAD
S	02/15/2012	ATY 2 BAILES, JASON CASE Removed	AXH
	04/12/2012	PCN added to case	CAD
U	02/19/2013	NOA; NOT GUILTY PLEA; REQ FOR DISCOVERY FILED BY ATY S BOGAR	LXB
S		ATY 3 BOGAR, SHON WILLIAM Added as Participant	
U		SCANNED: NOA-NOTICE OF APPEARANCE	CAD
S	03/31/2013	Warrant Served	LXB
	04/01/2013	Warrant Returned	
U		RETN OF SERVICE FORM RCVD FROM CCSO/FWD TO PRIS ARR	
S		ARR DVPRI Set for 04/01/2013 01:00 PM in Room 5 with Judge KEO ARR DVPRI: Held Proceedings Recorded on Tape No. G2 JPS	RLH LEV
U		DEF/DEF ATTY VAN DEF PRESENT/PER JPS DEF HELD WITHOUT BAIL/ SETOVER FOR SAC	
S		REV SAC Set for 04/02/2013 03:00 PM in Room 6 with Judge JPH	
U		SCANNED: NOA-NOTICE OF APPEARANCE SCANNED: MEMO OF DISPOSITION SCANNED: REFERRAL/ORDER APPOINTING ATTY SCANNED: FINANCIAL SCREENING SCANNED: RETURN OF SERVICE-WARRANT	CAD
S	04/02/2013	REV SAC: Held Proceedings Recorded on Tape No. 2-5 JPH	CXG
U		DEF/SAC TEAM PRES-DEF IN COMPLIANCE S/O SAC-HELD W/O BAIL/JPH	

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CLARK COUNTY DISTRICT COURT
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DEFENDANT
HANSEN, MATTHEW ALAN

CASE: 205066D CKP
Criminal Non-Traffic
Agency No.

TEXT - Continued

S 04/23/2013 Judge HAGENSEN, JOHN P Imposed Sentence TJW
Court Imposes Jail Time of 364 Days on Charge 5
with 364 Days Suspended, and
0 Days Credit for time served
Total Imposed on Charge 5:
with 5,000.00 Suspended 5,000.00
And 0.00 Other Amount Ordered
Active Supervised Probation : 2 Y
DVA : Domestic Violence Assessment
CDE : Chemical Dependency Evaluation
GUN : No Firearms/Possess Firearms
U 30 DAYS JAIL/TO RUN CONSECUTIVE TO ALL OTHER CASES/TERMINATED
FROM SAC COURT-JPH
SCANNED: ORDER -TERMINATE FROM SAC COURT CAD
SCANNED: MEMO OF DISPOSITION
SCANNED: NOTICE OF INELIGIBILITY TO POSSESS FIREARM
S 04/26/2013 Charge 1: Def. complied with Jail Sentence TJW
Imposed date for PAY changed to 04/23/2013
Imposed date for PAY changed to 04/23/2013
Imposed date for POS changed to 04/23/2013
Imposed date for NCR changed to 04/23/2013
Charge 3: Def. complied with Jail Sentence
Charge 4: Def. complied with Jail Sentence
Charge 5: Def. complied with Jail Sentence
Accounts Receivable Created 893.00
Accounts Receivable Changed to 1,093.00
Authorized by TJW
Case Scheduled on Time Pay Agreement 1 for: 1,093.00
First Pymt Date: 05/31/2013 Amt: 1,093.00 Freq: L Num: 1
05/10/2013 PCN added to case NRC
U 06/07/2013 SCANNED: ORDER ESTABLISHING CONDITIONS SGS
S 06/25/2013 Case Removed from Time Pay Agreement 348 01146 1 BMD
Case Removed from Time Pay Agreement 348 01146 1
Accounts Receivable Changed to 1,145.00
Authorized by BMD
Case Obligation Selected for Collections
MOT COLRE Set for 06/25/2021 07:30 AM with Judge COL
Collections: 1st Notice Prepared
07/31/2013 Case Obligation Assigned to ALLIANCEONE, INC for Collections
09/05/2013 SHO PV Set for 09/20/2013 08:30 AM SZN
in Room 6 with Judge JPH
SHO PV on 09/20/2013 08:30 AM
in Room 6 with Judge JPH Canceled
09/06/2013 SHO DVPV Set for 10/01/2013 08:30 AM
in Room 5 with Judge KEO
U SCANNED: PV-PROBATION VIOLATION
S 10/01/2013 OTH WARR Set for 10/01/2013 10:10 AM TJW
in Room 5 with Judge KEO
SHO DVPV: Not Held, Wt/FTA Ordered

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CLARK COUNTY DISTRICT COURT
D O C K E T

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DEFENDANT
HANSEN, MATTHEW ALAN

CASE: 205066D CKP
Criminal Non-Traffic
Agency No.

TEXT - Continued

S 10/01/2013 Proceedings Recorded on Tape No. G2 KEO
OTH WARR: Held
Proceedings Recorded on Tape No. G2 KEO
BENCH Warrant Ordered
Print on or after 10/01/2013
Warrant expires on 10/01/2018
10/02/2013 BENCH Warrant Issued for
Fail To Post Bail/Appr/Arrng PR
Fail To Comply
Fail To Appear For Hearing
No Bail
U SCANNED: WARRANT OF ARREST

TJW
SYS
LXB

ACCOUNTING SUMMARY

	Total Due	Paid	Credit	Balance
Timepay: N	1,145.00			1,145.00

COLLECTION STATUS

Status Date	Status Description	Clm Amt
07/31/2013	Agent Assigned by System	1145.00

Collection Agent: ALLIANCEONE, INC

ADDITIONAL CASE DATA

Case Disposition
Disposition: OPEN

Parties

Attorney
VITASOVIC, BROOKE ANN
BOGAR, SHON WILLIAM

Personal Description

Sex: M Race: W DOB: [REDACTED] 1980
Dr.Lic.No.: [REDACTED] State: WA Expires: 2010
Employer:
Height: 6 Weight: 170 Eyes: HAZ Hair: BRO

Hearing Summary

Held	DV PRISONER ARRAIGN	ON 10/19/2011 AT 01:00 PM IN ROOM 6	WITH JPH
Held	DV REVIEW	ON 11/01/2011 AT 01:00 PM IN ROOM 6	WITH JPH
Held	DV REVIEW	ON 11/09/2011 AT 01:00 PM IN ROOM 6	WITH JPH
Held	SAC COURT REVIEW	ON 11/15/2011 AT 02:30 PM IN ROOM A	WITH KLP
Held	SAC COURT REVIEW	ON 12/06/2011 AT 02:00 PM IN ROOM 1	WITH VLS
Held	SAC COURT REVIEW	ON 12/13/2011 AT 10:30 AM IN ROOM 1	WITH VLS
Held	WARRANT HEARING	ON 01/03/2012 AT 02:00 PM IN ROOM A	WITH KLP
Held	DV PRISONER ARRAIGN	ON 01/12/2012 AT 01:00 PM IN ROOM 6	WITH JPH
Held	SAC COURT REVIEW	ON 01/17/2012 AT 02:30 PM IN ROOM 1	WITH VLS
Held	SAC COURT REVIEW	ON 01/24/2012 AT 02:30 PM IN ROOM 1	WITH VLS
Held	SAC COURT REVIEW	ON 01/31/2012 AT 10:30 AM IN ROOM 1	WITH VLS

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10/25/2013 2:59 PM

CLARK COUNTY DISTRICT COURT
D O C K E T

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DEFENDANT
HANSEN, MATTHEW ALAN

CASE: 205066D CKP
Criminal Non-Traffic
Agency No:

ADDITIONAL CASE DATA - Continued

Hearing Summary

Held	WARRANT HEARING	ON 02/07/2012 AT 02:00 PM IN ROOM 1	WITH VLS
Held	DV PRISONER ARRAIGN	ON 04/01/2013 AT 01:00 PM IN ROOM 5	WITH KEO
Held	SAC COURT REVIEW	ON 04/02/2013 AT 03:00 PM IN ROOM 6	WITH JPH
Held	SAC COURT REVIEW	ON 04/09/2013 AT 03:00 PM IN ROOM 6	WITH JPH
Held	SAC COURT REVIEW	ON 04/16/2013 AT 10:30 AM IN ROOM 6	WITH JPH
Held	SAC COURT REVIEW	ON 04/23/2013 AT 03:00 PM IN ROOM 6	WITH JPH
Held	WARRANT HEARING	ON 10/01/2013 AT 10:10 AM IN ROOM 5	WITH KEO
Schedule	COLLECTION REVIEW	ON 06/25/2021 AT 07:30 AM IN ROOM	WITH COL

Case Review Status

CHARGE 50 - No Contact Order

Review Date
10/19/2016

Complied
T

End of docket report for this case